

Appl. No.: 09/768.989
Amdt. dated: November 1, 2004
Reply to Office action of 07/01/2004

REMARKS / ARGUMENTS

In the office action of July 1, 2004 claims 1-45 were rejected. In response, the applicant requests amendment of the application as indicated above.

Claim 24 stands objected to because the recited steps are not in proper alphabetical order. The applicant requests amendment of claim 24 as indicated above to replace the subpart designations (f) and (g) with the designations (d) and (e), respectively. The applicant submits that as amended the steps in the recited method are in alphabetical order and requests withdrawal of the objection.

Claim 1 stands rejected under 35 U.S.C. 112 as indefinite because there is insufficient antecedent basis for the term "said search term." The applicant requests amendment to replace the word "term" with "parameter" and submits that there is antecedent basis for "said search parameter." The applicant requests withdrawal of the rejection.

Claim 23 stands rejected under 35 U.S.C. 102 as anticipated by Boucher et al. (US Patent No. 5,884,246) (Boucher). The applicant respectfully submits that to anticipate a claim, a reference must teach every element of the claim as set forth in the claim, that is, "the identical invention must be shown in as complete detail as is contained in the claim." *Richardson v. Suzuki Motor Co.*, 868 F2d. 1226, 9 USPQ2d 1913 (Fed. Cir. 1989). While Boucher does not disclose a method of creating translations and therefore does not anticipate claim 23, the office action opines that a remote translation system would inherently require a translation database to relate words of two languages. The applicant requests amendment of claim 23 to clarify that the method includes selecting text containing a plurality of words in a first language for inclusion in a message from a plurality of available message texts; designating a second language; searching a database for a translated version of the selected message text; and transmission of the message including the translated text. The claimed method avoids the inaccuracy often resulting from translation of individual words, especially when a message includes specialized language or jargon. The applicant submits that Boucher does not disclose a method of communicating that includes selecting one of a plurality of message texts and searching a database comprising translations for a translation of the selected message text in

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the language of the recipient and, therefore, does not anticipate claim 23. The applicant requests withdrawal of the rejection.

Claims 1-4 and 12-22 stand rejected under 35 U.S.C. 103 as obvious over Nosohara, US Patent No. 5,956,740 (Nosohara) in view of Hamann, US Patent No. 6,092,740 (Hamann). The applicant submits that for a claim to be obvious under 35 U.S.C. 103, there must be some suggestion or motivation in either the references themselves or the knowledge generally to modify or combine the reference teachings, a reasonable expectation of success, and the references must teach or suggest all of the claim limitations (MPEP 2143). Claim 1 recites a method of locating an entity; an individual, business, organization, other entity (specification, pg. 4, lines 27-28); having an entity characteristic that is registered in a first language when a search parameter, in a second language, is specified.

According to the office action, Nosohara discloses a method that includes storing an entity identification and at least one entity characteristic in an entity record and searching the entity record for an entity characteristic corresponding to a search term. However, the applicant submits that Nosohara discloses a method of keyword searching, that is, searching a group of documents for documents that contain a particular word(s) (Abstract). While Nosohara also discloses that information related to a document, for example bibliographic data, can be stored and then displayed, in translated form, for documents that are identified as a result of a keyword search (column 6, line(s) 6-60), the applicant respectfully submits that nothing in Nosohara suggests that the bibliographic or other information related to a document is searchable to identify an entity or even a document. The applicant respectfully submits that Nosohara does not suggest or provide a motivation for a method of identifying an entity or even a document on the basis of the "characteristics" of documents.

Further, the office action concedes that Nosohara does not suggest utilizing a translation table to translate search terms, but asserts that Hamann discloses the use of a translation table for performing text translation and opines that it would have been obvious to combine a translation table as taught by Hamann with the multilingual document searching of Nosohara for a more efficient process for translating the text of keywords. The applicant submits that Hamann discloses a system that supplies text in a user specified target language for objects, such as, windows, menus and buttons that are generated and displayed by

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computer software (column 4, line(s) 38-44). However, the applicant submits that neither Nosohara nor Hamann suggests utilizing a text translation table to translate keywords for keyword document searching. Further, restricting the permissible keywords to a group of words included in a table is contrary to Nosohara which teaches that a keyword document searching system should permit the user to freely enter keywords for translation (column 3, line(s) 65-67). Nothing in Nosohara or Hamann suggests that a text translation table is efficient or even useable in a keyword searching system. Keyword searching, as disclosed by Nosohara, is problematic when utilized in an environment that includes more than one language, particularly when the environment includes a specialized language or jargon. For example, a keyword search for "bus technology" is likely to disclose a group of documents related to computers and a second group of documents related to transportation and the nature of the documents identified in a search using the Japanese term for "bus technology" is unpredictable. The claimed method increases the relevance of searches for entities operating in a complex language environment by coupling the searching system with registration of entities and their defining characteristics. The applicant respectfully submits that claim 1 is not obvious from Nosohara in view of Hamann because neither suggests nor provides a motivation for the modification suggested in the office action and, even if modified as suggested, Nosohara and Hamann do not disclose or suggest a method of identifying an entity that includes the steps of storing an entity identification and a characteristic of the entity in an entity record and searching the entity record for the entity characteristic using a search term in a second language obtained from a translation table. The applicant respectfully requests withdrawal of the rejection of claim 1.

Claims 2-4 and 12- 22 stand rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann. The applicant submits that claims 2-4 and 12-22 are dependent, respectively, from claim 1, or a claim dependent from claim 1, and inherit all of the limitations of the claim(s) from which they respectively depend. The applicant respectfully submits that since claim 1 is not obvious from the combination of Nosohara and Hamann for the reasons stated above, claims 2 - 4 and claims 12-22 are not obvious from the combination of Nosohara and Hamann. Further with regard to claims 2 and 16, the applicant submits that while the system of Nosohara might search for a document containing a keyword that coincidentally is the name a product or a

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service, the system does not identify an entity on the basis of an entity characteristic that is a product or service. Further with regard to claims 4, 14, 18, and 22, the applicant submits that nothing in Nosohara or Hamann suggests that the language used by the system includes specialized terminology or, more particularly, specialized terminology related to an activity of an entity that the system is attempting to identify. Further with regard to claim 15, the applicant submits that Nosohara does not attempt to identify a document on the basis of a document characteristic. The applicant requests withdrawal of the rejection of claims 2-4 and 12-22.

Claims 5-11 and 24-45 stand rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket et al., US Patent No. 6,122,666 (Beurket). The applicant submits that claims 5-11 are respectively dependent from claim 1, or a claim dependent from claim 1, and inherit all of the limitations of the claim(s) from which each respectively depends. The applicant respectfully submits that since claim 1 is not obvious from the combination of Nosohara and Hamann, for the reasons stated above, and since Beurket does not obviate the differences between claim 1 and the combination of Nosohara and Hamann, claims 5-11 are not obvious from the combination of Nosohara, Hamann and Beurket. Further, with regard to claim 5, while Beurket (column 7, line(s) 62 -column 8, line(s) 7) refers to enabling buyers to have "the Web pages and forms through which they order products translated into their local language," Beurket relates to a method of controlling a plurality of proxies to reduce duplicate object transformation and caching effort but is silent about displaying a registration form, reading data identifying an entity and an entity characteristic from a registration form, and storing that data. The applicant respectfully submits that the combination of Beurket, Nosohara and Hamann that is suggested in the office action is not suggested by the references and discloses a method of searching, accessing and displaying translated order forms stored on a plurality of proxies, but does not disclose a method, including the steps recited in dependent claim 5, of identifying an entity having particular characteristics. The applicant respectfully submits that claim 5 is not obvious from the combination of Nosohara, Hamann and Beurket and requests withdrawal of the rejection of claim 5.

The applicant submits that claims 6-8 are dependent from claim 5 and inherit all of the limitations of claim 5. The applicant respectfully submits that since claim 5 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claims 6-8

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are not obvious from the combination. Further with regard to claim 6, the applicant submits that while the system of Nosohara might search for a document containing a keyword that is, coincidentally, a name of a product or a service, the system does not attempt to identify an entity on the basis of an entity characteristic that is a product or service. Further with regard to claim 8, the applicant submits that nothing in Nosohara, Hamann or Beurket suggests that the language used by the system includes specialized terminology related to an activity of an entity that the system is attempting to identify. The applicant respectfully requests withdrawal of the rejections of claims 6-8.

The applicant submits that claim 9 is also dependent from claim 5 and inherits all of the limitations of claim 5 and since claim 5 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claim 9 is not obvious from the combination. Further, while Beurket (column 7, line(s) 62 -column 8, line(s) 7) refers to enabling buyers to have "the Web pages and forms through which they order products translated into their local language," the applicant respectfully submits that Beurket relates to a method of controlling a plurality of proxies to reduce duplicate object transformation and caching effort but is silent about the origin of the content of a transformed document. The applicant respectfully submits that Beurket does not disclose a method of displaying a registration form or any other form comprising the steps of obtaining content in a first language from a resource file, reading a first language term from a translation table, and displaying a form comprising content obtained from the resource file and the first language term. The applicant submits that even if it is assumed that a more comprehensible order form would be produced if the methods disclosed by Nosohara, Hamann and Beurket were combined, the combined disclosures do not disclose or suggest a method for identifying an entity that includes all of the steps of claim 9. The applicant respectfully submits that claim 9 is not obvious from the prior art and requests withdrawal of the rejection of claim 9.

The applicant submits that claims 10 and 11 are dependent from claim 9 and inherit all of the limitations of claim 9. The applicant respectfully submits that since claim 9 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claims 10 and 11 are not obvious from the combination. Further with regard to claim 11, the applicant submits that nothing in Nosohara, Hamann or Beurket suggests that the language

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used by the system includes specialized terminology related to an activity of an entity that the system is attempting to identify. The applicant respectfully requests withdrawal of the rejection of claims 10 and 11.

Claims 24 and 30 stand rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket for the "same reasons" that claims 1 and 5 were rejected. Claim 24 recites a method of locating an entity having an entity characteristic that is recorded in a registration language term when a term in a second language is specified as a search parameter. Claim 30 recites a data processing system including a registration module to record an identification of an entity and a related entity characteristic and a search engine to search for a record containing the entity characteristic. As stated with regard to claim 1, Nosohara discloses a system for locating documents by searching for keywords contained in the document, but Nosohara does not suggest that the system is useful for locating individuals, businesses, organizations, or other entities (specification, pg. 4, lines 27-28) and, while the office action observes that documents have characteristics (title and bibliographical data), the system of Nosohara performs keyword searches but does not attempt to identify documents on basis of the document's characteristics and makes no reference to a facility for registering a document in conjunction with its characteristics. Also, as indicated in response to the rejection of claim 5, the applicant submits that Beurket relates to a method of controlling a plurality of proxies to reduce duplicate object transformation and caching effort but is silent about displaying a registration form, reading data identifying an entity and an entity characteristic from a registration form, and storing that data in an entity record. The applicant further submits that Beurket does not disclose a facility enabling the performance of the undisclosed steps. The applicant submits that none of Nosohara, Hamann or Beurket discloses or suggests a method or data processing system for identifying an entity by searching an entity record for an entity characteristic. Further, the prior art does not suggest utilizing a text translation table to translate search parameters for a searching system and Nosohara teaches away from such a modification by teaching that a keyword searching system should permit the user to freely enter keywords rather than restricting the user to selection of a keyword included in a translation table. The applicant respectfully submits that claims 24 and 30 are not obvious from a combination of Nosohara, Hamann and Beurket because the references do not teach a method

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that includes all of the steps of the claimed method or a data processing system comprising the recited elements and there is no suggestion or motivation in the references for combining a keyword searching system with a system for supplying translated text for objects generated by a computer and a system for controlling a plurality of objects on a plurality of servers. The applicant respectfully requests withdrawal of the rejection of claims 24 and 30.

Claims 25-28 and claims 30-32 stand rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket. The applicant submits that claims 25-28 and claims 30-32 are, respectively, dependent from claims 24 and 30, or a claim dependent from claim 24 or claim 30, and inherit all of the limitations of the claim(s) from which each respectively depends. The applicant respectfully submits that since claims 24 and 30 are not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claims 25-28 and claims 30-32 are not obvious from the combination. Further with regard to claim 25, the applicant submits that while the system of Nosohara might search for a document containing a keyword that, coincidentally, is a product or a service, none of the prior art attempts to identify an entity on the basis of an entity characteristic that is a product or service. Further with regard to claims 27 and 32, the applicant submits that nothing in Nosohara, Hamann and Beurket suggests that the language used by the system includes specialized terminology or, more particularly, specialized terminology related to an activity of an entity that the system is attempting to identify. Further with regard to claim 28, while Nosohara refers to the display and translation of "document" characteristics such as a title and bibliographical data for documents identified by a keyword search, Nosohara does not suggest the use a "characteristic" as a descriptor to locate a document or an entity. The applicant respectfully submits that Nosohara, Hamann and Beurket do not suggest a method including all of the steps recited in claims 25-28 or a system including all of the elements of claims 30-32 and, therefore, claims 25-28 and claims 30-32 are not obvious from the prior art. The applicant requests withdrawal of the rejection of claims 25-28 and claims 30-32.

Claim 29 stands rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket for the "same reasons" that claims 1, 5 and 15 were rejected. Claim 29 recites a method of locating an entity having an entity characteristic that is recorded in a registration language term when a term in a second language is specified as a

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search parameter. As stated with regard to claim 1, Nosohara discloses a system for locating documents by searching for keywords contained in the document, but Nosohara does not suggest that the system is useful for locating individuals, businesses, organizations, or other entities (specification, pg. 4, lines 27-28) and, while the office action observes that documents have characteristics (title and bibliographical data), the system of Nosohara performs keyword searches but does not attempt to identify documents or entities on basis of these "characteristics" of documents. The applicant submits that none of Nosohara, Hamann or Beurket discloses or suggests a method or data processing system for identifying an entity by searching an entity record for an entity characteristic. Further, the prior art does not suggest utilizing a text translation table to translate search parameters for a searching system and Nosohara teaches away from such a modification by teaching that a keyword searching system should permit the user to freely enter a keyword rather than restricting the user to selection of a keyword included in a table. The applicant respectfully submits that claim 29 is not obvious from a combination of Nosohara, Hamann and Beurket because the references do not teach a method that includes all of the steps of the claimed method and there is no suggestion or motivation in the references for combining a keyword searching system with a system for supplying translated text for objects generated by a computer and a system for controlling a plurality of objects on a plurality of servers. The applicant respectfully requests withdrawal of the rejection of claim 29.

Claim 33 stands rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket. The applicant submits that claim 33 is dependent from claim 30 and inherits all of the limitations of the claim from which it depends. The applicant respectfully submits that since claim 30 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claim 33 is not obvious from the combination. In addition, the office action asserts that it would be obvious to use the data input means of Nosohara (FIG.1), for the input of registration data taught by Beurket. However, the applicant respectfully submits that Beurket makes no reference to "registration data" and, in particular, to data identifying of an entity and a characteristic of an entity. The applicant respectfully submits that Nosohara, Hamann and Beurket do not suggest a system including all

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of the elements of claim 33 and, therefore, claim 33 is not obvious from the prior art. The applicant requests withdrawal of the rejection of claim 33.

Claim 34 stands rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket. The applicant submits that claim 34 is dependent from claim 33 and inherits all of the limitations of the claim from which it depends. The applicant respectfully submits that since claim 33 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claim 34 is not obvious from the combination. The applicant requests withdrawal of the rejection of claim 34.

Claim 35 stands rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket. The applicant submits that claim 35 is dependent from claim 33 and inherits all of the limitations of the claim from which it depends. The applicant respectfully submits that since claim 33 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claim 35 is not obvious from the combination. Further, the applicant submits that communications control means of Nosohara receives keywords from and outputs search results to the display and input means, but none of the prior art discloses or suggests a registration form that includes an entity characteristic and, therefore, none of the prior art discloses or suggests a communication module performing the function recited in claim 35. The applicant respectfully submits that claim 35 is not obvious from the prior art and requests withdrawal of the rejection.

Claims 36-40 stand rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket. The applicant submits that claims 36-40 are, respectively, dependent from claim 30, or a claim dependent from claim 30, and inherit all of the limitations of the claim(s) from which each respectively depends. The applicant respectfully submits that since claim 30 is not obvious from the combination of Nosohara, Hamann and Beurket for the reasons stated above, claims 37-40 are not obvious from the combination and requests withdrawal of the rejections. In addition, the applicant respectfully submits for the further reasons stated with regard to claims 1, 12, 15 and 33 that claim 36 is not obvious from the prior art and requests withdrawal of the rejection. The applicant respectfully submits that claim 36-40 are not obvious from the prior art and requests withdrawal of the respective rejections.

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Claim 41 stands rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket for the reasons expressed with regard to claims 1, 5, 9 and 15. The applicant submits that for the reasons asserted above with regard to claims 1, 5, 9 and 15, the combinations of Nosohara, Hamann and Beurket suggested by the office action, with respect to the various claims, do not disclose a data processing system including all of the elements of claim 41 and do not suggest or provide a motivation for the combination suggested in the office action. The applicant respectfully submits that none of the prior art includes a registration module performing the functions specified in claim 41 or a search engine to identify an entity.

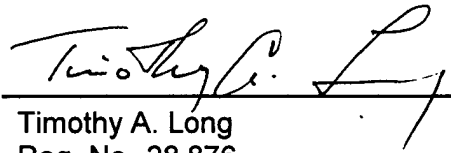
Claims 42-45 stand rejected under 35 U.S.C. 103 as obvious over Nosohara in view of Hamann and further in view of Beurket. The applicant submits that claims 42-45 are dependent from claim 41 and inherit all of the limitations of the claim(s) from which they respectively depend. The applicant respectfully submits that since claim 41 is not obvious from the combination of Nosohara and Hamann for the reasons stated above, claims 42-45 are not obvious from the combination of Nosohara, Hamann and Beurket. Further with regard to claim 42 and 16, the applicant submits that while the system of Nosohara might search for a document containing a keyword that coincidentally is the name a product or a service, the system does not attempt to identify an entity on the basis of an entity characteristic that is a product or service. Further with regard to claims 44 the applicant submits that nothing in Nosohara, Hamann or Beurket suggests that the language used by the system includes specialized terminology or, more particularly, specialized terminology related to an activity of an entity that the system is attempting to identify. The applicant respectfully submits that claims 42-45 are not obvious from the prior art and requests withdrawal of the respective rejections.

The applicant respectfully requests that a timely Notice of Allowance be issued in this case. If the Examiner believes that for any reason direct contact with applicant's attorney would

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advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the number below.

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